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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

IN RE:	§	
	§	
AVANINDRAKUMAR SOMBHAI PATEL	§	CASE NO. 21-20266-RLJ-7
RANJANBEN A. PATEL	§	
	§	Chapter 7
Debtors.	§	

RESPONSE TO AND RESERVATION OF RIGHTS BY BANK OF THE PANHANDLE
REGARDING TRUSTEE'S OBJECTION TO CLAIM NO. 13

Bank of the Panhandle (“**BOP**”), a creditor and party in interest, files the following response to the Trustee’s Objection to Claim Number 13 of Bank of the Panhandle (the “**Objection**”) [Doc. No. 38]:

1. BOP requests a hearing on the Objection.
2. BOP does not object to the Objection to the extent of disallowing BOP’s Claim as a secured claim against assets these debtors’ bankruptcy estate. On information and belief, security for BOP’s claim is secured by non-debtor persons’ grant of liens against property that is not property of the estate in this case.
3. BOP, however, reserves all rights regarding its claims against any other obligors or property that is not directly property of these debtors’ bankruptcy estate.
4. If and to the extent that BOP elects not or, or is found not to be entitled to, participate in the Trustee’s distribution, if any, in this case, BOP’s rights should be preserved by way of any order entered on the Objection. Accordingly, BOP requests that it be allowed to review any proposed order presented by the Trustee regarding the Objection prior to submission to the Court for consideration.

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5. BOP consents to the entry of final orders by the bankruptcy judge.

Respectfully submitted,

/s/ Roger S. Cox

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CERTIFICATE OF SERVICE

A copy of the foregoing was served by ECF (electronic) notification in this case.

Date of service: March 14, 2023 /s/ Roger S. Cox